

From: Rebecca Dabkowski
To: [Langlie, Gary](#)
Subject: NRC Questions: Linde Application to the NRC for approval of Indirect Transfer of Control - 5 NRC Export licenses
Date: Thursday, August 30, 2018 1:45:24 PM

Hi Mr Langlie,

Please see my responses below in blue. Please let me know if you have any additional questions or need additional information.

Kind regards,

Rebecca

Rebecca Dabkowski
Trade Compliance Manager- RAS
Linde Gas North America LLC
1 Greenwich Street, Suite 100, Stewartville NJ 08886
O: 908 329 9742 C: 908 619 3708 FX: 866 801 9710
Email: rebecca.dabkowski@linde.com

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1 – please confirm alignment on the five addresses listed on the export licenses – there are different addresses given – as part of this proposed indirect transfer of control do any of the licenses need to be amended, so all provide a consistent company address?

All license amendments currently reflect the correct address below except for XMAT423. This amendment application will be submitted in the near future and will include the request to update the address.

Linde Electronics and Specialty Gases,
a Division of Linde Gas North America LLC
200 Somerset Corporate Blvd, Suite 7000
Bridgewater, NJ 08807

1a. - ALSO - Do licenses' addresses need to be amended to match the address included on page 3 of Attachment C to your letter.

No. That is a satellite office address.

2 – Please confirm that Linde Delaware Investments, Inc. will remain the direct parent of the licensee after this proposed corporate reorg?

Yes. Linde Delaware Investments will remain the direct parent of the licensee.

3 – Confirm whether, after reorg., Linde North America, Inc. will have any control over the license or licensee?

Linde North America will not have any control over the licensee.

From: Langlie, Gary [mailto:Gary.Langlie@nrc.gov]
Sent: Monday, August 27, 2018 11:09 AM
To: Rebecca Dabkowski <rebecca.dabkowski@linde.com>
Subject: NRC Questions: Linde Application to the NRC for approval of Indirect Transfer of Control - 5 NRC Export licenses

Caution: The identity of the sender of this message could not be verified as it originates from the Internet. Please pay attention!

Hi Rebecca,

Some questions:

1 – please confirm alignment on the five addresses listed on the export licenses – there are different addresses given – as part of this proposed indirect transfer of control do any of the licenses need to be amended, so all provide a consistent company address? 1a. - ALSO - Do licenses' addresses need to be amended to match the address included on page 3 of Attachment C to your letter.

2 – Please confirm that Linde Delaware Investments, Inc. will remain the direct parent of the licensee after this proposed corporate reorg?

3 – Confirm whether, after reorg., Linde North America, Inc. will have any control over the license or licensee?

Thanks,
Gary

From: Rebecca Dabkowski [mailto:rebecca.dabkowski@linde.com]
Sent: Monday, August 27, 2018 9:50 AM
To: Langlie, Gary <Gary.Langlie@nrc.gov>
Subject: Linde Application to the NRC for approval of Indirect Transfer of Control - 5 NRC Export licenses

Hi Mr Langlie,

Linde understands that the information submitted will be placed in Adams. Thank you for verifying this with me.

Kind regards

Rebecca

From: Langlie, Gary [<mailto:Gary.Langlie@nrc.gov>]

Sent: Monday, August 27, 2018 9:09 AM

To: Rebecca Dabkowski <rebecca.dabkowski@linde.com>

Subject: RE: Linde Application to the NRC for approval of Indirect Transfer of Control - 5 NRC Export licenses

Caution: The identity of the sender of this message could not be verified as it originates from the Internet. Please pay attention!

Hi Rebecca,

Just to confirm – the NRC plans to place your whole incoming packet into PUBLIC, repeat PUBLIC, ADAMS. Please verify.

Thx,
Gary

From: Rebecca Dabkowski [<mailto:rebecca.dabkowski@linde.com>]

Sent: Thursday, August 09, 2018 1:12 PM

To: Langlie, Gary <Gary.Langlie@nrc.gov>

Subject: Linde Application to the NRC for approval of Indirect Transfer of Control - 5 NRC Export licenses

Hi Gary,

My responses are below in blue.

How about your XMAT428 license – I see it expires 31 Dec 2018? Is this part of this transfer of control?

XMAT428 – This license was issued for a one-time need to return out of spec material to our vendor. We do not have an ongoing need to renew this license.

Regarding the five licenses you reference in your letter – I notice XMAT423 expires also on 31 Dec 2018? Are you still exporting on that license, or have you reached the limits of that particular license. If so, may, just maybe, it would not have to be a part of this indirect transfer of control request – I would need to check on that.

XMAT423 – This license is fully active and will be submitted for renewal in the coming weeks and should be included in the request.

Does Linde have any NRC licenses (domestic) issued under other parts of the NRC's regulations (such as Part 30, 40, 50, 52, 70, or 72)?

Linde does not have any domestic licenses.

Please let me know if you have further questions or need additional information.

Kind regards,

Rebecca

From: Langlie, Gary [<mailto:Gary.Langlie@nrc.gov>]

Sent: Thursday, August 09, 2018 11:35 AM

To: Rebecca Dabkowski <rebecca.dabkowski@linde.com>

Subject: Linde Application to the RNC for approval of Indirect Transfer of Control - 5 NRC Export licenses

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Hi Rebecca,

I will be working this case with our OGC. I left you vmail also. But, might be better if you answer my questions in this email – that way I can refer to it.

How about your XMAT428 license – I see it expires 31 Dec 2018? Is this part of this transfer of control?

Does Linde have any NRC licenses (domestic) issued under other parts of the NRC's regulations (such as Part 30, 40, 50, 52, 70, or 72)?

Regarding the five licenses you reference in your letter – I notice XMAT423 expires also on 31 Dec 2018? Are you still exporting on that license, or have you reached the limits of that particular license. If so, may, just maybe, it would not have to be a part of this indirect transfer of control request – I would need to check on that.

I am not a lawyer, but just wanted to ask you about XMAT428 and XMAT423.

Many thanks!!!

Gary

Gary Langlie
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U.S. Nuclear Regulatory Commission
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Gary.Langlie@nrc.gov

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